

*Attorney docket OHG 144*

**REMARKS**

Claims 1, 9 and 16 are requested to be amended. Claims 2, 10, and 17 are canceled.

[1-2] Claims 1-3, 5, 6, 9-11, 13, 16, 17, 21, and 23 were rejected under §103 over Park '259 in view of Tokuda '289 and Kato '764. This rejection is respectfully traversed. Claims 2, 10 and 17 argued for below.

**Advantages.** The Applicant's semiconductor device uses a so-called WCSP manufacturing process such that the semiconductor chip and external terminals are directly connected without the use of an interposer such as a substrate, and the operational speed, functional sophistication, number of functions, and compactness of the semiconductor device can be increased, as compared with a device in which a wire bonding connection, for example, is used. The semiconductor device can also be obtained with the same electrical characteristics but at a lower cost than a device in which a flip chip connection, for example, is used. (See the specification, page 25, lines 20 - page 26, lines 4)

**Park.** Park discloses a stack package comprising metal wire (100) but does not disclose the claimed features, in particular, electrode posts (claims 1, 9 and 16, respectively). Accordingly, Park does not provide the Applicant's advantages.

**Tokuda.** Tokuda merely discloses a chip connection structure comprising wiring substrate having "direct through hole connection". Tokuda does not disclose the claimed features, in particular, the electrode posts of claims 1, 9 and 16, respectively, and therefore does not provide the Applicant's advantages.

**Kato.** The new reference, Kato, discloses an optical communication apparatus comprising at least an optical module and an assembly substrate on which the optical module is mounted. The optical module has an optical device, an optical fiber optically coupled to the optical device, and a package encasing the optical device and at least a part of the optical fiber. The package includes a base and a cap forming a cavity, and the optical device and the optical fiber are set in the cavity. The package is molded by flowing resin substantially parallel with the optical axis of the optical fiber, the base and cap for the package being made by an injection method or a transfer method.

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The Applicant's previous arguments are reiterated and incorporated by reference. For example, the Applicant argued before that Tokuda's chip 10 rests on a die-attached film 30 which is "adhesive" (col. 10, line 41) and therefore not silicon. The substrate 20, on which the film 30 rests, is made of polyimide (col. 10, line 54) and Tokuda gives reasons why this is a preferred material, so there is no teaching toward using another material, such as silicon. Thus, Takuda teaches against the silicon which asserted to be taught by Kato.

The Applicant also argued that Yamaguchi does not actually disclose the claimed subject matter.

Withdrawal of the objections and rejections is requested.

Respectfully submitted,

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Date

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